

cc: H.L. Schuier

A.2

10/2/86

VILLAGE OF SAUGET
SANITARY DEVELOPMENT AND RESEARCH ASSOCIATION
10 MOBILE STREET
SAUGET, ILLINOIS 62201

15375

October 2, 1986

bcc: B. DeFer
C. Malloch - F4EA
S. Mueller, Amax
D. Taylor, Ethyl
P. Tandler, Cerro Copper
J. Bagarino - Midwest Rubber
W. Smull

The Honorable Alan J. Dixon
United States Senate
230 S. Dearborn St.
Chicago, IL 60604

Dear Senator Dixon:

I am writing you this letter to ask your urgent help.

In a recent decision, the United States Court of Appeals for the Third Circuit overturned major aspects of EPA's pretreatment "removal credit program" under the Clean Water Act. If the ruling is allowed to stand, the removal credits program will effectively be eliminated. The Chemical Manufacturers Association (CMA) intervened in that litigation in support of EPA and is appealing the decision to the United States Supreme Court. On August 17, 1986, CMA filed it's petition for certiorari. The CMA and others have had several meetings with EPA to ask EPA to petition the Supreme Court for a review of the ruling. These meetings have been attended by other industrial trade associations and the Association of Metropolitan Sewage Agencies (AMSA).

As you are aware, we are currently starting up a state-of-the-art municipal treatment plant which will serve East St. Louis, Cahokia, Sauget and other local communities. This plant would not have been possible without the strong support of our local industries, both from providing a technical, as well as a cost, participation in the project.

The plant was designed to remove major industrial pollutants, as well as providing secondary treatment for the municipalities involved. Much of the industry participation was premised on the basis that removal credits would be available to them once the plant had started up. Where the new treatment plant was capable of removing pollutants levels consistent with the Clean Water Act requirements, the industries involved would be able to utilize removal credits as a means to minimize the need for installing expensive, redundant treatment facilities of their own.

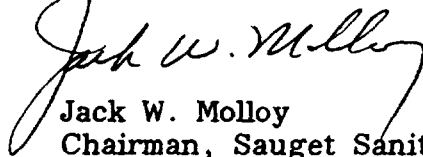
C07327

Several of our major industrial users are members of the CMA and other associations who have met with EPA, as discussed above. I earnestly ask that you encourage EPA Administrator Thomas to join CMA and file an EPA petition asking for the Supreme Court to review the Third Circuit decision. The timing on such a request is urgent, since EPA must complete their filing with the Supreme Court by October 9.

The communities involved, the industry users of our treatment facilities, have jointly come a long way in making this excellent treatment facility a reality. We need your help to ensure that the commitments to cost-effective treatment are not lost.

Thank you.

Sincerely,



Jack W. Molloy
Chairman, Sauget Sanitary
Development & Research Association

/cm

VILLAGE OF SAUGET
SANITARY DEVELOPMENT AND RESEARCH ASSOCIATION
10 MOBILE STREET
SAUGET, ILLINOIS 62201

October 2, 1986

The Honorable Paul Simon
United States Senate
230 South Dearborn, Room 3892
Chicago, IL 60604

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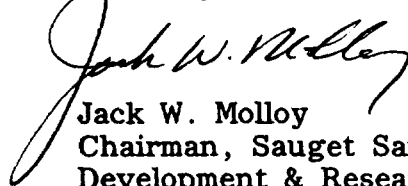
C07329

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Thank you.

Sincerely,

A handwritten signature in dark ink, appearing to read "Jack W. Molloy". The signature is fluid and cursive, with a large initial "J" and "M".

Jack W. Molloy
Chairman, Sauget Sanitary
Development & Research Association

/cm